

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION**

JEREMY KARG, MATTHEW R.  
LAMARCHE, CYNTHIA K. MARSHALL,  
SHIRLEY RHODES, and JEANINE E. VEGA,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

TRANSAMERICA CORPORATION;  
TRUSTEES OF THE AEGON USA, INC.  
PROFIT SHARING TRUST; and DOES 1–40;

Defendants.

Case No. 1:18-cv-00134-CJW-KEM

**PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS**

Judge: Hon. C.J. Williams  
Magistrate: Hon. Kelly Mahoney

Pursuant to Fed. R. Civ. P. 23(h)(1) and 54(d)(2) and the Court's Order dated July 9, 2021 (Doc. 87), Plaintiffs hereby respectfully move the Court to award attorney's fees of \$1,950,000, reimbursement of expenses of \$452,104.59, and a service award of \$15,000 for each of the Class Representatives.

In support of this motion, Plaintiffs rely upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Awards; and the Declarations of counsel Charles Field and J. Barton Goplerud.

Dated: October 1, 2021

/s/ J. Barton Goplerud

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